

Secretary
Federal Communications Commission
1919 M Street,
N.W., Room 222
Washington, D.C. 20554

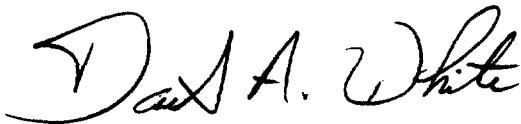
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January 31, 1996

Please accept, and file for processing, the attached documents as "petition to institute a rule making proceeding to amend the television table of allotments". The signed "original" and four copies of the rule making request are enclosed with this letter.

Sincerely,



David A. White
Engineering Consultant
10400 Olson Drive
Eau Claire, Wisconsin 54703

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Petition to amend the TV Table of Allotments

(Rule Part 73.606)

REQUEST:

This is a request for amendment of the current "Allotment of Television Channels" (Section 73.606), to add **television channel 30** for new television service to **Irma, Wisconsin**.

REASONS FOR ASSIGNMENT:

1. The largely rural north central Wisconsin area, is presently "underserved" by existing television stations. The area meets both the "transmission test" and "reception test" for definition of an "underserved" area (FCC Report & Order 91-182), with NO local service, and 4 or fewer receivable signals available. There are currently NO television stations licensed to Irma, Wisconsin, nor any of the other cities and communities in Lincoln, Taylor, and Langlade Counties. Irma is centrally located between the two principal cities in Lincoln county, those being Merrill (pop. 9,860) and Tomahawk (pop. 3,328) (See attached map). The underserved Lincoln County area includes a population of 26,993 people (1990 U.S. Census) and 10,400 television households (1995 Broadcast Yearbook).

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2. There are **NO** television channel allotments (Part 73.606) for Irma, Wisconsin, nor any of the other cities and communities in the underserved Lincoln, Taylor, and Langlade Counties.
3. The nearest available television channel on the television allotment table (Part 73.606), is channel 33, which is allocated to Wausau, Wisconsin. Channel 33 can not be licensed in Irma, Wisconsin (nor anywhere in Lincoln County) because it would not meet FCC short spacing requirements (Part 73.698) for adjacent channel separation from channel 34. Channel 34 is allocated to Eagle River, Wisconsin. The current application on file for channel 34 specifies a transmitter site at Lat. 45 deg. 46' 30", and a Long. 89 deg. 14' 55". From that transmitter site, the separation distance to Irma would be 57.6 KM (35.8 miles), which is 30.1 KM (18.7 miles) short of the Part 73.698 adjacent channel requirement of 87.7 KM (54.5 miles).
4. The best way to provide new television service to this underserved rural area is through amendment of the television allocation table (Part 73.606) to include a new channel allocation for a community located in Lincoln County, Wisconsin. Based on it's central location, and advantageous

geographical elevation (U.S.G.S. topographical map attached), Irma, Wisconsin would be an ideal location for establishing "city grade" television service for the entire underserved rural Lincoln, Taylor, and Langlade County area.

5. Engineering research indicates that the television **channel 30** would be technically acceptable, and best suited, for allocation to **Irma, Wisconsin**. As indicated by the data in **Engineering Exhibit 1** (engineering attachment) a television channel 30 allocation at Irma would meet or exceed all minimum distance separation requirements of Part 73.698 and 73.610(b) including; IF beat, intermodulation, adjacent channel, oscillator, sound image, picture image, and cochannel.
6. As indicated in the attached engineering statement, allocation of television channel 30 for service to Irma, Wisconsin would have no adverse affects on the availability of television channels already allocated to other communities (Part 73.606). Operation of television channel 30 would not cause interference, nor would it require modification of any already operating television stations.

PETITIONER'S INTERESTS:

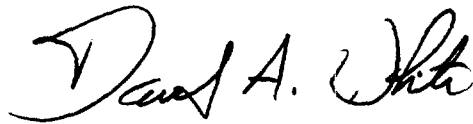
Upon amendment of television allocation table (Part 73.606), to include TV channel 30 for Irma, Wisconsin, it is the petitioner's intention to promptly file application to provide "full power" television service for this underserved rural Wisconsin area.

SUMMARY:

In order to best serve the rural north central Wisconsin population, it is necessary to amend the television table of allocations (Part 73.606) to include a channel 30 allotment to Irma, Wisconsin. Allocation of channel 30 would provide local television service for the first time anywhere in Lincoln County.

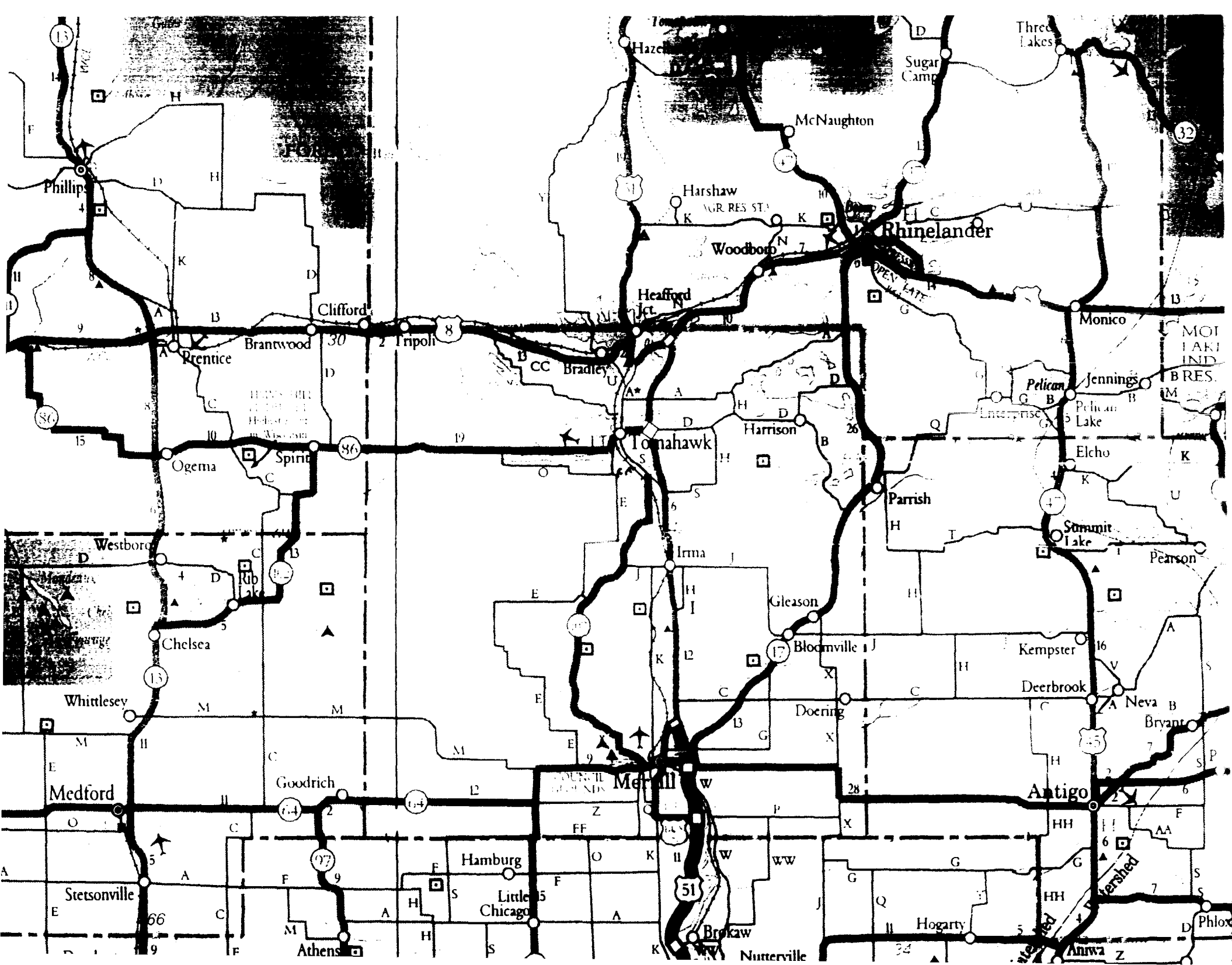
With respect to the Commission's concern on reserving spectrum for future "advanced television service", there is sufficient UHF spectrum currently available to include this allocation amendment and still provide for all future needs in this largely rural area. To deny this "petition for amendment" on the basis of future spectrum needs, would be a great public disservice to the rural population of north central Wisconsin.

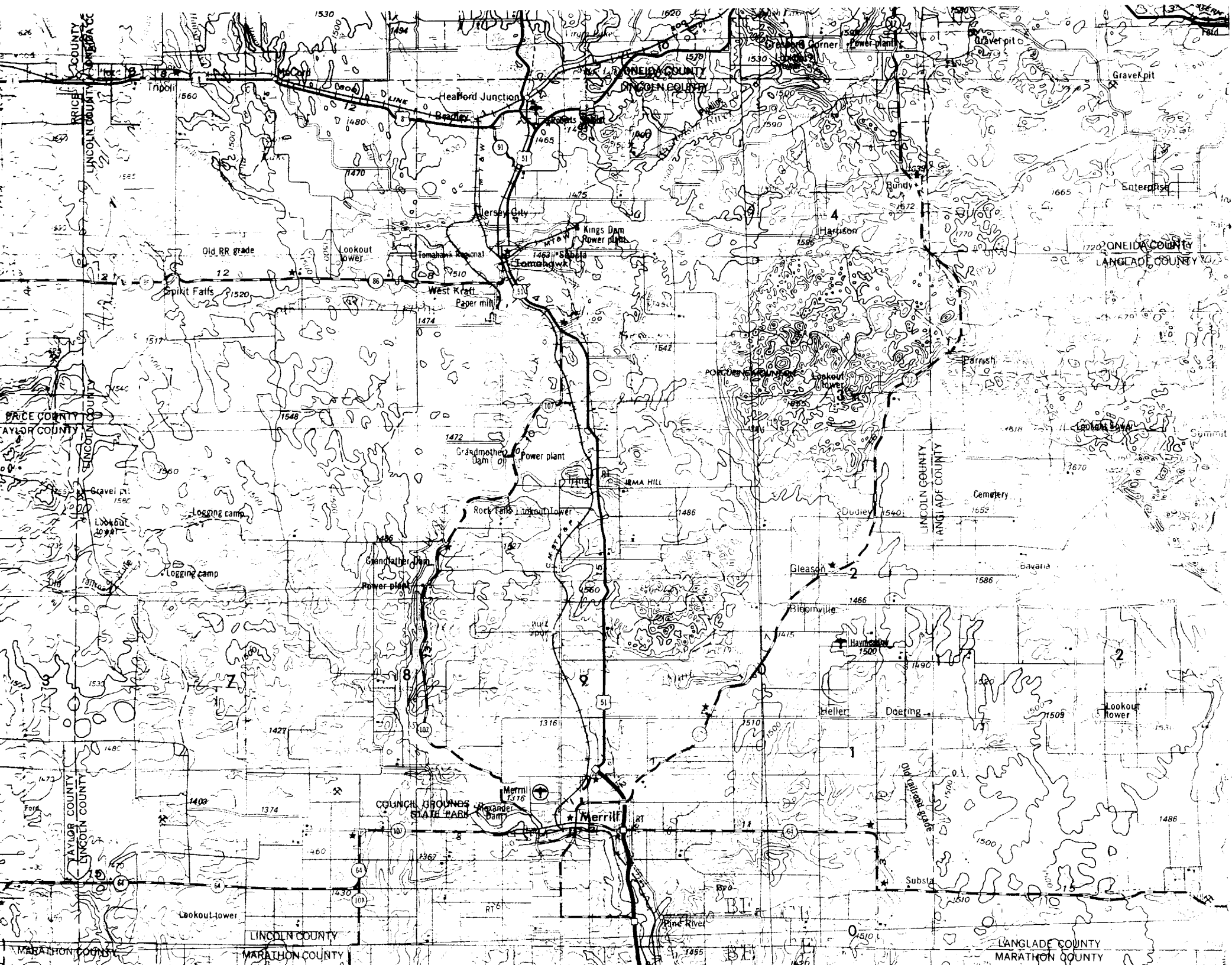
The public interest will be best served by
amending the allotment table (Part 73.606) now,
and allow local television service to be provided
with out delay.

A handwritten signature in black ink that reads "David A. White". The signature is fluid and cursive, with the first name "David" being more prominent than the last name "White".

David A. White
Engineering Consultant
10400 Olson Drive
Eau Claire, WI 54703

(day) 715-835-1881
(evening) 715-836-9915





ENGINEERING EXHIBIT 1

Nearest allotment..		Separation Required		Actual Distance		Excess	Separation	Geog. Co-Ordinates	
Channel (Part 73.606)		(KM)	(Miles)	(KM)	(Miles)	(KM)	(Miles)	N. Lat. / W. Long.	
15	Ironwood, MI	119.9	74.5	127.2	79.1	7.3	4.6	46.28.18	90.00.43
16	Rice Lake, WI	95.7	59.5	165.9	103.1	70.2	43.6	45.32.16	91.45.50
22	Oshkosh, WI	31.4	19.5	170.7	106.1	139.3	86.6	44.02.47	88.31.44
23	Minneapolis, MN	95.7	59.5	273.5	170.0	177.8	110.5	45.03.30	93.07.27
25	La Crosse, WI	31.4	19.5	217.9	135.4	186.5	115.9	43.48.16	91.22.18
26	Green Bay, WI	31.4	19.5	173.0	107.5	141.6	88.0	44.21.30	87.58.48
27	Madison, WI	31.4	19.5	256.1	159.1	224.7	139.6	43.03.09	89.28.42
28	Menominee, WI	31.4	19.5	175.6	109.1	144.2	89.6	45.02.47	91.51.42
29	Minneapolis, MN	87.7	54.5	273.5	170.0	185.8	115.5	45.03.30	93.07.27
30	Milwaukee, WI * Zone 1	248.6	154.5	287.5	178.7	38.9	24.2	43.05.15	87.54.19
31	La Crosse, WI	87.7	54.5	217.7	135.3	130.0	80.8	43.48.17	91.22.06
32	Appleton, WI	31.4	19.5	172.7	107.3	141.3	87.8	44.21.32	87.58.58
33	Wausau, WI	31.4	19.5	48.0	29.8	16.6	10.3	44.55.14	89.41.31
34	Eagle River, WI	31.4	19.5	57.6	35.8	26.2	16.3	45.46.30	89.14.55
35	Winona, MN	31.4	19.5	214.9	133.5	183.5	114.0	44.02.31	91.40.47
37	Ch. 37 is reserved for radio astronomy	95.7	59.5	N/A	N/A	N/A	N/A	N/A	
38	Green Bay, WI	31.4	19.5	168.0	104.4	136.6	84.9	44.24.35	88.00.05
44	Green Bay, WI	95.7	59.5	168.0	104.4	72.3	44.9	44.24.35	88.00.05
45	Richland Center, WI	119.9	74.5	230.8	143.4	110.9	68.9	43.20.14	90.22.44

Separation distances are calculated to both metric and U.S. standards by use of the mathematical formulas and geographic co-ordinate reference points, as specified by FCC rule Part 73.208 and 73.611. Separations were verified by scale measurement on USGS 7 1/2' topographical survey maps. Irma, WI is located at N. Latitude 45 deg. 21 min. 09 sec and W. Longitude 89 deg. 40 min. 18 sec.

ENGINEERING CERTIFICATION

As a practicing broadcast engineer with 19 years of television engineering experience and holder of a Bachelors degree in Industrial Electronics, I certify that I have accurately calculated, and measured all television channel separation requirements contained in Part 73.698 and Part 73.610(b). I have verified that all separation requirements are met and exceeded by at least 7.3 kilometers (4.6 miles). There are no other broadcast television transmitters at this Irma Wisconsin location, and no interference to other spectrum users would be created by utilizing UHF television channel 30 at that location. My research also indicates that a station operating from this location, on UHF channel 30, would likely cover all of Lincoln County with "city grade" (+80dbu) television service.



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